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March 30, 2022

## BY ECF

Mary Kay Vyskocil United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States v. Lymberatos</u>, 21 CR 170 (MKV)

Dear Judge Vyskocil:

I am writing on behalf of defendant Dimitrios Lymberatos to respectfully request a modification of the defendant's conditions of release which would permit him to travel to Alexandria, Virginia on April 7 and return to New York that same day in order to act as the sober companion for an individual completing rehabilitation in Long Island and returning to his home. Both the government, by AUSA Kedar Bhatia, and Pretrial Services, by PTSO Laura Gialanella, have no objection to this request. If approved, Mr. Lymberatos would provide Pretrial Services with a detailed itinerary of his trip.

By way of background, Judge Moses released the defendant on October 9, 2020 pursuant to a \$200,000 personal recognizance bond secured by two financially responsible persons and the defendant's home, with travel limited to the Southern and Eastern Districts of New York. In the time since his release, the defendant has remained compliant with the aforementioned conditions.

## JEFFREY LICHTMAN

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Thank you for the Court's consideration of this application. I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,

Jeffrey Lichtman

cc:

All counsel (by ECF)

Pretrial Services (by email)

SO ORDERED:

Date: March 31, 2022

HON. MAKY KAY YYSKOCIL, U.S.D.J